

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

DISH NETWORK L.L.C.,

Plaintiff,

V.

DOE 1 d/b/a ZemTV, Does 2-4,  
individually and together d/b/a  
[www.tvaddons.ag](http://www.tvaddons.ag), [www.tvaddons.org](http://www.tvaddons.org), and  
[www.streamingboxes.com](http://www.streamingboxes.com),

**Defendants.**

Civil Action No. \_\_\_\_\_

**LETTER OF REQUEST FOR INTERNATIONAL ASSISTANCE FROM THE  
REPUBLIC OF FRANCE TO OBTAIN CERTAIN DOCUMENTS FROM ONLINE SAS  
PURSUANT TO THE HAGUE CONVENTION ON THE TAKING OF EVIDENCE  
ABROAD IN CIVIL OR COMMERCIAL MATTERS**

The United States District Court for the Southern District of Texas, through the undersigned District Court Judge, requests international assistance to obtain evidence to be used in a civil proceeding before this Court in the above-captioned case.

If any portion of this Request is deemed to be unacceptable under the laws of the Republic of France, please disregard that portion and continue to comply with as much of the Request as is legally permissible. The Court is willing and able to provide similar assistance to the judicial authorities of the Republic of France should a similar request for international assistance be received from the courts of the Republic of France.

## I. GENERAL INFORMATION

- Sender:** Office of the Clerk  
United States District Court for the  
Southern District of Texas, Houston Division  
515 Rusk Avenue  
Houston, TX 77002, USA
- Central Authority of the  
Requested State:** Ministère de la Justice  
Direction des Affaires Civiles et du Sceau

Bureau du droit de l'Union, du droit international  
privé et de l'entraide civile (BDIP)  
13, Place Vendôme  
75042 Paris Cedex 01

3. **Person to whom the Executed Request is to be Returned:**  
Stephen M. Ferguson  
Hagan Noll & Boyle LLC  
Two Memorial City Plaza  
820 Gessner, Suite 940  
Houston, Texas 77024  
Phone: (713) 343-0478  
Facsimile: (713) 758-0146  
Email: Stephen.ferguson@hnbllc.com  
*Counsel for Plaintiff DISH Network L.L.C.*
4. **Specification of the date By which the requesting Authority requires receipt Of the response to the Letter of Request:**  
As soon as possible, and in any event not later than July 24, 2017.  
  
Reason for urgency: Plaintiff DISH Network needs information sufficient to identify Defendant Doe 1 so they can be named in the lawsuit and it can proceed.

**II. IN CONFORMITY WITH ARTICLE 3 OF THE HAGUE CONVENTION, THE UNDERSIGNED APPLICANT HAS THE HONOR TO SUBMIT THE FOLLOWING REQUESTS :**

1. **Requesting Judicial Authority:**  
United States District Court for the  
Southern District of Texas, Houston Division  
515 Rusk Avenue  
Houston, TX 77002, USA
2. **Competent Authority:**  
Ministère de la Justice  
Direction des Affaires Civiles et du Sceau  
Bureau du droit de l'Union, du droit international  
privé et de l'entraide civile (BDIP)  
13, Place Vendôme  
75042 Paris Cedex 01
3. **Names and Addresses Of Parties and Their Representatives:**

Plaintiff:  
DISH Network LLC

Defendants:  
Does 1-4 d/b/a ZemTV, [www.tvaddons.ag](http://www.tvaddons.ag),  
[www.tvaddons.org](http://www.tvaddons.org), and [www.streamingboxes.com](http://www.streamingboxes.com)

**Plaintiff's Representatives:**

Stephen M. Ferguson  
Joseph H. Boyle  
Hagan Noll & Boyle, LLC  
Two Memorial City Plaza  
820 Gessner, Suite 940  
Houston, TX 77024  
(713) 343-0478 – Tel  
(713) 758-0146 – Fax  
[stephen.ferguson@hnbllc.com](mailto:stephen.ferguson@hnbllc.com)  
[joe.boyle@hnbllc.com](mailto:joe.boyle@hnbllc.com)

**Defendants' Representatives:**

Unknown. Defendants have not made an appearance.

4. **Nature of the Proceedings:** This is a civil suit seeking money damages and permanent injunctive relief. DISH Network asserts copyright infringement claims against Defendants who are capturing broadcasts of television channels exclusively licensed to DISH Network in the United States and unlawfully retransmitting those channels over the Internet to customers of the ZemTV service in the United States and who have downloaded the ZemTV add-on for the Kodi media player from the websites [www.tvaddons.ag](http://www.tvaddons.ag) and [www.tvaddons.org](http://www.tvaddons.org).
5. **Summary of Defense:** Unknown. Defendants have not appeared in the case.
6. **Evidence to be obtained:**

This request is directed to Online SAS located at 8 rue de la Ville L'evêque, 75008 Paris, France. DISH Network seeks the following documents from Online SAS:

**Definitions Applicable To Document Requests**

1. **Online Customer.** "Online Customer" means each person or entity assigned or otherwise responsible for each of the following IP addresses:
  - a. **195.154.156.235** from August 9, 2016 through February 2, 2017;
  - b. **163.172.30.228** from August 9, 2016 through January 19, 2017;
  - c. **195.154.46.92** from October 2, 2016 through March 9, 2017;
  - d. **163.172.24.61** from May 1, 2017 through May 5, 2017;
  - e. **163.172.31.140** from November 4, 2016 through January 19, 2017;
  - f. **163.172.31.158** from November 4, 2016 through January 19, 2017;
  - g. **163.172.47.169** from May 1, 2017 through May 5, 2017;

- h. **163.172.140.173** from December 19, 2016 through February 17, 2017;
- i. **163.172.142.242** from November 4, 2016 through May 5, 2017;
- j. **163.172.219.53** from January 5, 2017 through February 17, 2017;
- k. **212.47.247.42** from January 19, 2017 through January 26, 2017;
- l. **212.47.233.115** from January 19, 2017 through May 5, 2017;
- m. **212.47.247.148** from January 5, 2017 through February 17, 2017;
- n. **51.15.7.65** from May 1, 2017 through May 5, 2017;
- o. **51.15.36.92** from February 20, 2017 through February 24, 2017;
- p. **51.15.37.118** from March 9, 2017 through May 5, 2017;
- q. **51.15.38.122** from February 20, 2017 through February 24, 2017;
- r. **51.15.42.135** from February 2, 2017 through May 5, 2017;
- s. **51.15.53.37** from February 20, 2017 through February 24, 2017;
- t. **51.15.55.140** from December 19, 2016 through May 5, 2017;
- u. **51.15.57.108** from March 9, 2017 through May 5, 2017;
- v. **51.15.60.46** from January 5, 2017 through January 26, 2017;
- w. **51.15.68.81** from May 23, 2017 through May 24, 2017;
- x. **51.15.69.13** from May 23, 2017 through May 24, 2017;
- y. **51.15.76.222** from May 23, 2017 through May 24, 2017;
- z. **51.15.137.107** from February 17, 2017 through April 7, 2017.

**Document Requests**

- 1. Documents sufficient to identify the full name, contact information (including physical addresses, web addresses, email addresses, telephone numbers, and fax numbers), and IP addresses of each Online Customer.
- 2. Documents submitted to you in order to create or make changes to each account associated with each Online Customer.
- 3. Account statements for each account associated with each Online Customer for the time period of February 1, 2014 to present.
- 4. Payment records for each account associated with each Online Customer for the time period of February 1, 2014 to present.
- 5. Communications sent to or received from each Online Customer, including account set-up correspondence and support tickets, for the time period of February 1, 2014 to present.
- 7. **Documents or other property To be produced:** See documents listed in the section entitled "Evidence to be obtained".
- 8. **Special methods or procedures:** DISH Network requests that the documents and materials responsive to the categories of information identified above be emailed (if possible) or copied and mailed to Stephen M.

Ferguson at the address identified in Section II.3 above. DISH Network shall pay the fees and costs incurred that are reimbursable. Please direct requests for payment to DISH Network's representatives, identified above in Section 3.

DATE OF REQUEST: June 19, 2017



*Vanessa E. Egan*

District Court Judge  
United States District Court  
Southern District of Texas

(SEAL OF COURT)

Authenticated Signature by Clerk of the Court:

DAVID BRADLEY, Clerk of the Court

By: *By Thom*  
Deputy Clerk

Court's Authentication that the Clerk of Court is the Clerk of Court:

By: *Vanessa E. Egan*  
UNITED STATES DISTRICT JUDGE